

A&O SHEARMAN

VIA ECF

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
Room 705  
40 Foley Square  
New York, NY 10007

Allen Overy Shearman Sterling US LLP  
599 Lexington Avenue  
New York  
NY 10022

Tel +1 212 610 6326  
Direct line +1 646 831 9566  
David.Esseks@aoshearman.com

November 15, 2024

**Re: *United States v. Shojaeinia*, 22-Cr-379 (PGG)**

Dear Judge Gardephe:

We represent Mohsen Shojaeinia. The Court recently granted our application to adjourn sentencing until December 5, 2024, to allow the parties to continue discussions and to accommodate long-scheduled travel out of the country between November 18 and December 1. The Court stated that no further requests for adjournment would be granted.

Our discussions with the Government have progressed and we expect that Mr. Shojaeinia will meet with the Government before the currently scheduled sentencing date of December 5. We write now to request a further one-week adjournment of sentence, to December 12 or thereafter, to allow the parties to confer regarding the effect, if any, of that meeting on sentencing.

The Government has no objection to this request.

Respectfully submitted,  
/s/ David Esseks  
David Esseks

*Counsel for the Defendant*

cc: AUSA Jacob Gutwillig

MEMO ENDORSED

*The application is denied.*

SO ORDERED:

*Paul G. Gardephe*  
Paul G. Gardephe, U.S.D.J.

Dated: Nov. 15, 2024

Allen Overy Shearman Sterling US LLP is a limited liability partnership organized under the laws of the State of Delaware. Allen Overy Shearman Sterling US LLP is affiliated with Allen Overy Shearman Sterling LLP, a limited liability partnership registered in England and Wales with registered number OC306763 and with its registered office at One Bishops Square, London E1 6AD. It is authorized and regulated by the Solicitors Regulation Authority of England and Wales (SRA number 401323). The term partner is used to refer to a member of Allen Overy Shearman Sterling LLP or an employee or consultant with equivalent standing and qualifications. A list of the members of Allen Overy Shearman Sterling LLP and of the non-members who are designated as partners is open to inspection at its registered office at One Bishops Square, London E1 6AD.

Allen Overy Shearman Sterling US LLP is an affiliate of Allen Overy Shearman Sterling LLP. Allen Overy Shearman Sterling LLP or an affiliated undertaking has an office in each of: Abu Dhabi, Amsterdam, Antwerp, Austin, Bangkok, Beijing, Belfast, Boston, Bratislava, Brussels, Budapest, Casablanca, Dallas, Dubai, Dublin, Düsseldorf, Frankfurt, Hamburg, Hanoi, Ho Chi Minh City, Hong Kong, Houston, Istanbul, Jakarta (associated office), Johannesburg, London, Los Angeles, Luxembourg, Madrid, Milan, Munich, New York, Paris, Perth, Prague, Riyadh, Rome, San Francisco, São Paulo, Seoul, Shanghai, Silicon Valley, Singapore, Sydney, Tokyo, Toronto, Warsaw, Washington, D.C.